THE HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 COOPER MOORE and ANDREW GILLETTE, on Case No. 2:21-cv-01571-BJR their own behalf and on behalf of all others similarly situated, STIPULATED MOTION AND ORDER FOR 8 EXTENSION OF SCHEDULING ORDER Plaintiffs. 9 ٧. 10 ROBINHOOD FINANCIAL LLC, a Delaware 11 limited liability company, 12 Defendant. 13 I. STIPULATED MOTION 14 1. On January 26, 2023, the Court entered its Order Setting Case Schedule (ECF No. 15 69), outlining the deadlines for the case through trial. 16 The parties have been diligently conducting discovery for several months. Both 2. 17 sides have been working to make document productions, provide supplemental written 18 responses, and conduct discovery with relevant third parties. Additionally, the parties have 19 been discussing deposition scheduling. 20 3. The parties are also addressing discovery disputes. One such dispute was heard 21 by the Court on March 22, 2023 and resulted in Defendant being required to produce additional 22 documents. Moreover, Defendant is currently seeking documents from a third party which is 23 the subject of three motions to quash pending in the Southern District of New York. The 24 hearing on the motions to quash is currently set for April 24, 2023. 25 4. The current deadline for the completion of class certification fact discovery is 26 April 28, 2023. The parties agree that, despite their diligent efforts, they both require 27 STIPULATED MOTION AND ORDER FOR TERRELL MARSHALL LAW GROUP PLLC 936 North 34th Street, Suite 300 EXTENSION OF SCHEDULING ORDER - 1 Seattle, Washington 98103-8869 TEL. 206.816.6603 • FAX 206.319.5450

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- 5. Defendant is in the process of searching for and producing responsive documents, and has committed to making all reasonable efforts to complete its productions for the class certification fact discovery period by June 20, 2023, and to keep Plaintiffs updated should it be unable to meet this commitment.
- 6. Therefore, the parties stipulate and agree to the following proposed extended schedule, subject to the Court's approval:

Deadline for class certification fact discovery Plaintiffs' expert report(s) served on defendant Defendant's expert report(s) served on plaintiffs Plaintiffs' rebuttal expert report(s) served on Defendant Deadline to complete class certification expert discovery Deadline for Defendant's certification response Deadline for Plaintiffs' October 2, 2023 Deadline for Plaintiffs' October 16, 2023 Deadline for Plaintiffs' October 16, 2023 Deadline for Plaintiffs' October 16, 2023 February 7, 2024 Disclosure of expert testimony under FRCP 26(a)(2) Expert discovery cut off Dispositive motion deadline (including			
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motions regarding experts)	motions regarding experts)		

STIPULATED MOTION AND ORDER FOR EXTENSION OF SCHEDULING ORDER - 2 Case No. 2:21-cv-01571-BJR

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1		Deadline to file proposed	January 8, 2025	April 2, 2025		
2		pretrial order (including joint pretrial statement),				
3		proposed joint <i>voir dire</i> ,				
4		proposed jury instructions,				
		proposed verdict form, and motions in limine (to				
5		be filed in a single, joint				
6		brief) Deadline to file	January 15, 2025	April 9, 2025		
7		oppositions to motions in	January 13, 2023	April 9, 2023		
8		limine (no replies will be				
9		permitted) Pretrial conference	January 23, 2025	April 17, 2025		
10		Trial	February 2, 2025 (or at the	May 5, 2025 (or at the		
			court's convenience)	court's convenience)		
11						
12	Based on the foregoing, the parties respectfully request that the Court grant their					
13						
14		and extend the case somedan				
15			his 17th day of April 2022			
16	STIPULATED TO AND DATED this 17th day of April, 2023.					
	TERRE	LL MARSHALL LAW GROUP	DAVIS WRIGHT T	REMAINE (SEA)		
17	By: /s	/ Jennifer Rust Murray	By: /s/ Eric Franz			
18	By: <u>/s/Jennifer Rust Murray</u> Beth E. Terrell, WSBA #26759			son, WSBA #26369		
19	Email: bterrell@terrellmarshall.com		• •			
20	Jennifer Rust Murray, WSBA #36983 Email: jmurray@terrellmarshall.com			te Rainwater, WSBA #43625 ainwater@dwt.com		
21	936 North 34th Street, Suite 300			<u> </u>		
	Seattle, washington 98103			Email: ericfranz@dwt.com		
22	Telephone: (206) 816-6603 Facsimile: (206) 319-5450		•	Theo A. Lesczynsk, WSBA #59780 Email: theolesczynski@dwt.com		
23	1 40	33mme. (200) 313 3 130	920 Fifth Aven	-		
24	Sophia M. Rios, Admitted Pro Hac Vice			Seattle, Washington 98104-1610		
25	Email: srios@bm.net		·	Telephone: (206) 622-3150 Facsimile: (206) 757-7700		
		1 B Street, Suite 2000	, acsimile, (200	.,		
26		Diego, CA 92101	Attorneys for Def	endant		
27		ephone: (619) 489-0300 simile: (215) 875-4604				
			ND.			
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EXTENSION OF SCHEDULING ORDER - 3

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E. Michelle Drake, Admitted Pro Hac Vice Email: mdrake@bm.net BERGER MONTAGUE PC 1229 Tyler Street NE, Suite 205 Minneapolis, Minnesota 55413 Telephone: (612) 594-5999 Facsimile: (612) 584-4470 Attorneys for Plaintiffs

STIPULATED MOTION AND ORDER FOR **EXTENSION OF SCHEDULING ORDER - 4** Case No. 2:21-cv-01571-BJR

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1	II. ORDER
2	The Court GRANTS the parties' stipulated motion.
3	IT IS SO ORDERED on this 18th day of April, 2023.
4	Q. 1 D.
5	Barbara & Rothstein
6	HONORABLE BARBARA J. ROTHSTEIN UNITED STATES DISTRICT JUDGE
7	ONITED STATES DISTRICT TODGE
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